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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Case No. 2:24-cr-00456-TJH

V.

**JOINT STIPULATION TO FILE
ENLARGED BRIEFS**

ANDREW LEFT.

Defendant.

Crim. L.R. 57-1 provides that Civ. L.R. (“L.R.”) shall govern the conduct of criminal proceedings, and L.R. 7-1 permits parties to jointly request an order affecting the progress of a case by stipulation.

Pursuant to L.R. 7-1, the Parties stipulate and jointly request that the Court enter an order permitting enlarged briefing in connection with Defendant's contemplated Federal Rule of Criminal Procedure 12 ("Rule 12") motion to be filed by January 27, 2025, as follows: (1) 1,500 extra words for the motion, (2) 1,500 extra words for the opposition, and (3) 1,000 extra words for the reply.

The Parties stipulate and agree there is good cause for the jointly requested order based on the following:

1 1. On September 4, 2024, the Court ordered Defendant to file any Rule
 2 12 motion to dismiss no later than January 27, 2025. ECF No. 29.

3 2. L.R. 11-6.1 limits all memorandum of points and authorities to no
 4 more than 7,000 words, unless otherwise ordered by the Court.

5 3. On January 21, 2025, the Parties met and conferred about Defendant's
 6 desire to request an order permitting enlarged briefing to ensure that legal issues are
 7 adequately presented in a case Defendant submits is complex and novel.

8 4. The Indictment alleges 18 counts of securities fraud and one false
 9 statement count, related to the alleged trading of 17 different securities.

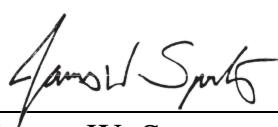
10 5. Applying the law to the alleged charges requires enlarged briefing,
 11 given the complexity of this case.

12 For these reasons, the Parties respectfully request that the Court enter an
 13 order permitting the following enlarged briefing: (1) 1,500 extra words for the
 14 motion, (2) 1,500 extra words for the opposition, and (3) 1,000 extra words for the
 15 reply.

16 Dated: January 21, 2025

17 Respectfully submitted,

18 SPERTUS, LANDES & JOSEPHS, LLP

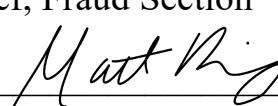
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Certificate of Compliance

The undersigned, counsel for Defendant Andrew Left, certifies this memorandum of points and authorities contains 280 words, which complies with the word limit of L.R. 11-6.1.

Dated: January 21, 2025

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